

# EXHIBIT A

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**1:16-cv-00029-JL Falletta et al v. Connelly et al**

Joseph N. Laplante, presiding

Date filed: 01/26/2016

Date of last filing: 03/12/2018

## History

Doc. No.	Dates	Description
	Filed: 01/26/2016 Entered: 01/27/2016	Case Assigned
<u>1</u>	Filed & Entered: 01/26/2016	Complaint - New Case
	Filed & Entered: 01/27/2016	Notice - ECF
<u>2</u>	Filed & Entered: 01/27/2016	Amended Complaint
<u>3</u>	Filed & Entered: 01/27/2016	Summons - Waiver Issued
<u>4</u>	Filed & Entered: 03/03/2016	Waiver of Service Executed
<u>5</u>	Filed & Entered: 03/03/2016	Return of Service Executed
<u>6</u>	Filed & Entered: 03/21/2016	Waiver of Service Executed
<u>7</u>	Filed & Entered: 03/22/2016 Terminated: 03/24/2016	Motion to Extend Time to Answer
	Filed & Entered: 03/24/2016	Order on Motion for Extension of Time to Answer
<u>8</u>	Filed & Entered: 05/02/2016	Waiver of Service Executed
<u>9</u>	Filed & Entered: 05/13/2016	Notice of Attorney Appearance
<u>10</u>	Filed & Entered: 05/13/2016 Terminated: 06/07/2016	Motion to Dismiss for Failure to State a Claim
<u>11</u>	Filed & Entered: 05/13/2016	Answer to Amended Complaint
	Filed & Entered: 05/16/2016	ECF - Filing Error - Info Only
<u>12</u>	Filed & Entered: 05/16/2016	Notice of Attorney Appearance
<u>13</u>	Filed & Entered: 05/16/2016	Answer to Complaint
	Filed & Entered: 05/17/2016	Notice of Pretrial Conference
<u>14</u>	Filed & Entered: 05/23/2016	Objection to Motion
	Filed & Entered: 05/25/2016	Notice of Pretrial Conference
	Filed & Entered: 06/07/2016	Order on Motion to Dismiss for Failure to State a Claim
<u>15</u>	Filed & Entered: 06/09/2016 Terminated: 06/28/2016	Motion to Withdraw as Attorney
<u>16</u>	Filed: 06/13/2016 Entered: 06/14/2016	Letter
	Filed: 06/28/2016 Entered: 06/29/2016	Order on Motion to Withdraw as Attorney
	Filed & Entered: 06/29/2016	Notice of Pretrial Conference
<u>17</u>	Filed & Entered: 06/29/2016	Withdrawal of Counsel - Individual
<u>18</u>	Filed & Entered: 07/19/2016	Notice of Attorney Appearance
<u>19</u>	Filed & Entered: 07/26/2016	Discovery Plan

	Terminated:	07/29/2016	
	Filed:	07/28/2016	● Pretrial Conference
	Entered:	08/09/2016	
	Filed & Entered:	07/29/2016	● Trial Notice
<u>20</u>	Filed & Entered:	07/29/2016	● Order on Discovery Plan
<u>21</u>	Filed & Entered:	08/09/2016	● Amended Complaint
<u>22</u>	Filed & Entered:	08/25/2016	● Summons-Waiver - Request for Issuance
<u>23</u>	Filed & Entered:	08/26/2016	● Summons - Waiver Issued
<u>24</u>	Filed & Entered:	10/31/2016	● Motion to Dismiss
	Terminated:	11/29/2016	
<u>25</u>	Filed & Entered:	10/31/2016	● Answer to Amended Complaint
<u>26</u>	Filed & Entered:	10/31/2016	● Waiver of Service Executed
<u>27</u>	Filed & Entered:	10/31/2016	● Waiver of Service Executed
<u>28</u>	Filed & Entered:	10/31/2016	● Waiver of Service Executed
	Filed & Entered:	11/14/2016	● Order on Motion to Extend Time
	Filed & Entered:	11/14/2016	● Trial Notice
	Filed & Entered:	11/14/2016	● Notice of Hearing
<u>29</u>	Filed & Entered:	11/14/2016	● Motion to Continue and Extend
	Terminated:	11/14/2016	
	Filed & Entered:	11/29/2016	● Order on Motion to Dismiss
<u>30</u>	Filed & Entered:	11/30/2016	● Answer to Amended Complaint
<u>31</u>	Filed & Entered:	12/09/2016	● Answer to
	Filed & Entered:	12/14/2016	● ECF - Filing Error - Info Only
<u>32</u>	Filed & Entered:	12/14/2016	● Notice of Voluntary Dismissal
<u>33</u>	Filed & Entered:	12/14/2016	● Notice of Attorney Appearance
<u>34</u>	Filed & Entered:	12/14/2016	● Notice of Attorney Appearance
<u>35</u>	Filed & Entered:	12/14/2016	● Notice (Other)
<u>36</u>	Filed & Entered:	12/14/2016	● Notice (Other)
	Filed & Entered:	12/15/2016	● Order
	Filed & Entered:	12/15/2016	● Order
<u>37</u>	Filed & Entered:	12/29/2016	● Answer to
<u>38</u>	Filed & Entered:	12/29/2016	● Answer to
<u>39</u>	Filed & Entered:	12/29/2016	● Answer to
<u>40</u>	Filed & Entered:	12/29/2016	● Answer to
	Filed & Entered:	12/30/2016	● ECF - Filing Error - Info Only
<u>41</u>	Filed & Entered:	02/08/2017	● Notice of Attorney Appearance
<u>42</u>	Filed & Entered:	02/08/2017	● Notice (Other)
<u>43</u>	Filed & Entered:	02/10/2017	● Notice of Attorney Appearance
	Filed:	02/14/2017	● Order
	Entered:	02/16/2017	
	Filed:	02/22/2017	● Order on Motion to Appear Pro Hac Vice

	Entered: 02/23/2017	
<u>44</u>	Filed & Entered: 02/22/2017 Terminated: 02/22/2017	Ⓜ Motion to Appear Pro Hac Vice
<u>45</u>	Filed & Entered: 03/14/2017 Terminated: 03/15/2017	Ⓜ Motion to Continue and Extend
	Filed: 03/15/2017 Entered: 03/16/2017	Ⓜ Order on Motion to Continue and Extend Deadlines
	Filed & Entered: 03/16/2017	Ⓜ Trial Notice
	Filed & Entered: 04/04/2017	Ⓜ Reset Pretrial Order Deadlines PUBLIC
	Filed & Entered: 04/07/2017	Ⓜ Clerk's Notice-Mediation Statement
<u>46</u>	Filed & Entered: 04/21/2017	Ⓜ Mediation Statement
	Filed: 04/24/2017 Entered: 04/25/2017	Ⓜ Order
	Filed & Entered: 05/12/2017	Ⓜ Cure Notice - Action Requested
<u>47</u>	Filed & Entered: 05/12/2017 Terminated: 05/16/2017	Ⓜ Motion to Continue and Extend
	Filed & Entered: 05/15/2017	Ⓜ Rescheduling Notice of Hearing
<u>48</u>	Filed & Entered: 05/15/2017	Ⓜ Addendum
	Filed: 05/16/2017 Entered: 05/17/2017	Ⓜ Order on Motion to Continue and Extend Deadlines
	Filed & Entered: 05/17/2017	Ⓜ Trial Notice
	Filed & Entered: 05/17/2017	Ⓜ Order
<u>49</u>	Filed & Entered: 05/17/2017 Terminated: 05/17/2017	Ⓜ Motion for Discovery
	Filed & Entered: 05/18/2017	Ⓜ Discovery Status Conference
<u>50</u>	Filed & Entered: 11/14/2017 Terminated: 12/05/2017	Ⓜ Motion to Continue and Extend
	Filed & Entered: 12/05/2017	Ⓜ Order on Motion to Continue and Extend Deadlines
	Filed & Entered: 12/12/2017	Ⓜ Notice of Hearing
	Filed & Entered: 12/15/2017	Ⓜ Order on Motion to Withdraw as Attorney
<u>51</u>	Filed & Entered: 12/15/2017 Terminated: 12/21/2017	Ⓜ Motion to Withdraw as Attorney
	Filed & Entered: 12/21/2017	Ⓜ Rescheduling Notice of Hearing
	Filed & Entered: 12/21/2017	Ⓜ Telephone Conference
	Filed & Entered: 12/21/2017	Ⓜ Order on Motion to Withdraw as Attorney
<u>52</u>	Filed & Entered: 12/29/2017	Ⓜ Order
<u>53</u>	Filed & Entered: 01/15/2018 Terminated: 02/23/2018	Ⓜ Motion to Withdraw as Attorney
	Filed & Entered: 01/23/2018	Ⓜ Notice of Hearing
	Filed & Entered: 01/31/2018	Ⓜ Notice of Hearing
	Filed & Entered: 02/08/2018	Ⓜ Telephone Conference
	Filed & Entered: 02/08/2018	Ⓜ Order on Motion to Withdraw as Attorney
<u>54</u>	Filed & Entered: 02/12/2018	Ⓜ Motion to Continue and Extend

	<b>Terminated:</b>	03/05/2018	
	<b>Filed &amp; Entered:</b>	02/23/2018	Order on Motion to Withdraw as Attorney
<u>55</u>	<b>Filed &amp; Entered:</b>	02/23/2018	Withdrawal of Counsel - Individual
	<b>Filed:</b>	03/05/2018	Order on Motion to Continue and Extend Deadlines
	<b>Entered:</b>	03/06/2018	
<u>56</u>	<b>Filed &amp; Entered:</b>	03/05/2018	Notice of Pro Se Appearance
	<b>Filed &amp; Entered:</b>	03/06/2018	Trial Notice
<u>57</u>	<b>Filed:</b>	03/12/2018	Motion to Stay
	<b>Entered:</b>	03/14/2018	

PACER Service Center			
Transaction Receipt			
03/19/2018 14:40:09			
<b>PACER Login:</b>	chpmott1234:4686129:0	<b>Client Code:</b>	
<b>Description:</b>	History/Documents	<b>Search Criteria:</b>	1:16-cv-00029-JL
<b>Billable Pages:</b>	3	<b>Cost:</b>	0.30

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

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Susan Falletta and Joseph Falletta

Plaintiffs,

v.

Dr. Thomas Connelly, DDS and  
Dr. Bryan Hoertdoerfer, DDS

Defendants.

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CASE NO: 1:16-cv-00029

**MOTION TO EXTEND DEADLINES ESTABLISHED IN THE  
COURT'S MAY 17, 2017 TRACKING ORDER**

The Plaintiffs, Susan and Joseph Falletta, through counsel, move to extend the current scheduling order deadlines and request that a status conference be scheduled for May of 2018.

As grounds for this request, the Plaintiffs state as follows:

1. Per the Court's verbal order (February 8, 2018), a revised discovery plan/Civil Form 3 is being filed with the Court that extends all non-lapsed deadlines and trial for three months.
2. The revised dates and deadlines are appropriate due to the recent bankruptcy filing of Dr. Thomas Connelly, who is an indispensable party to this action and from whom discovery is still owed.
3. It is in the interest of justice and practicality for the current deadlines, including those for Completion of Discovery and Trial, to be extended as outlined on the attached Civil Form 3.
4. The plaintiffs request that a status conference be set approximately three months from today's date to assess the status of Dr. Connelly's bankruptcy and its impact on this case.
5. The instant motion is made in good faith and not for any dilatory motive.
6. No separate memorandum is required for this motion.

7. The Civil Form 3 is attached to this motion and incorporated herein.
8. Attorney Mark Sullivan, counsel for Dr. Thomas Connelly takes no position relative to the filing of this Motion.
9. Attorney Christina P. Mott, counsel for Dr. Bryan Hoerltoerfer, assents to the extension on a general basis, but **objects** to the proposed July 10, 2018 trial date.
10. Counsel has conferred with her clients regarding the relief requested herein and they are agreeable to same.
11. The Plaintiffs are not aware of any other matters that should be brought to the Court's attention at this time; and plan to discuss the case status with the Court at the upcoming status conference in May of 2018.

WHEREFORE, the Plaintiffs respectfully request that this Court allow the instant Motion and extend the current scheduling order deadlines for Completion of Discovery and Trial as outlined on the Civil Form 3 and schedule a status conference for May of 2018.

Respectfully submitted,

Date: February 12, 2018

Plaintiffs,

Susan and Joseph Falletta

By their Attorneys

GETMAN, SCHULTHESS, STEERE  
& POULIN, PA

By: Elizabeth Hurley

Christopher J. Poulin, Esq. (#12525)

Elizabeth L. Hurley, Esq. (#16851)

#### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading has been electronically provided to Attorney Christina Mott and Attorney Mark Sullivan, counsel of record.

Dated: February 12, 2018

By: Elizabeth Hurley

Elizabeth L. Hurley, Esq. (#16851)





**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

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Susan Falletta and Joseph Falletta

Plaintiffs,

v.

Dr. Thomas Connelly, DDS,  
Dr. Bryan Hoertdoerfer, DDS,  
Hoertdoerfer Equities, LLC; and  
Hoertdoerfer Dentistry, PLLC

Defendants.

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CASE NO: 1:16-cv-00029

**Civil Form 3, Extending Deadlines Established by Discovery Plan**

**ATTACHMENT TO PARTIES' JOINT MOTION TO EXTEND DEADLINES  
ESTABLISHED IN THE COURT'S MAY 17, 2017 ORDER**

<b><u>Scheduling Designation</u></b>	<b><u>Current Deadline</u></b>	<b><u>Proposed Deadline</u></b>
Completion of Discovery	11/08/17	05/31/18
Disclosure of Experts and Experts' Written Reports and Supplementations [Plaintiff]	07/14/17	N/A
Disclosure of Experts and Experts' Written Reports and Supplementations [Defendant]	09/15/17	N/A
Challenges to Expert Testimony	11/01/17	N/A
Disclosure of Claims Against Unnamed Parties	07/01/17	N/A
Joinder of Additional Parties (Plaintiff)	07/01/17	N/A

Joinder of Additional Parties (Defendant)	07/01/17	N/A
Third-Party Actions	07/01/17	N/A
Amendment to Pleadings (Plaintiff)	07/01/17	N/A
Amendment to Pleadings (Defendant)	07/01/17	N/A
Motion to Dismiss	09/01/17	N/A
Motions for Summary Judgment	11/15/17	N/A
Trial	04/03/18	07/10/18